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March 18, 2019

BY ELECTRONIC MAIL

Hon. Ronnie Abrams
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

USDC-SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/20/19

Application granted. The attached exhibit shall be filed under seal.

SO ORDERED.

Ronnie Abrams, U.S.D.J.
March 20, 2019

Re: *United States v. Galanis*, S3 16 Cr. 371 (RA)

Dear Judge Abrams:

I represent Devon Archer. I write to respectfully request the Court's permission for Mr. Archer to travel with his family to the Turks and Caicos Islands from March 26–31, 2019. Mr. Archer's family planned a vacation for when his children are on their spring break from school.

The Court previously granted numerous requests for Mr. Archer to travel on business and one prior travel request for Mr. Archer's family to travel on vacation to Jamaica. [See ECF No. 711.] As we explained in the prior request to travel for a family vacation, Mr. Archer is making full use of this time during the pendency of his case to both rebuild his business and to strengthen his relationship with his family. The Archers benefited greatly from that prior family trip, and the current proposed trip will provide another opportunity for them to deepen their bond and share memorable experiences together. As before, the Court's Pretrial Services Office consents to this request, but the Government objects. A copy of Mr. Archer's proposed flight and lodging information is attached as Exhibit A, which we respectfully request to be filed under seal.

As the Court is aware, Mr. Archer has travelled internationally with the Court's permission on twenty-one prior occasions, to Jamaica, Italy, England, Spain, France, Latvia, Lithuania, Russia, Kazakhstan, the United Arab Emirates, Vietnam, China, Hong Kong, Malaysia, Singapore, Indonesia, Mexico, the Philippines, and Ukraine. On each and every trip, Mr. Archer has returned on time, and without incident, demonstrating that he is no risk of flight. In particular:

- On June 13, 2016, Your Honor permitted Mr. Archer to travel on business to Italy.
- On July 26, 2016, Your Honor permitted Mr. Archer and his wife, Dr. Archer, to travel on business to Latvia.
- On September 9, 2016, Your Honor permitted Mr. Archer to travel on business to China.
- On October 17, 2016, Your Honor permitted Mr. Archer to travel on business to England and Lithuania. On October 21, 2016, Your Honor further granted

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permission for Mr. Archer to modify his itinerary to include business travel to Russia.

- On November 28, 2016, Your Honor permitted Mr. Archer to travel on business to England and Spain.
 - On January 4, 2017, Your Honor permitted Mr. Archer to travel on business to Vietnam and China. On January 17, 2017, Your Honor further granted permission for Mr. Archer to modify his itinerary to include travel to the United Kingdom.
 - On February 16, 2017, Your Honor permitted Mr. Archer to travel on business to Singapore, Malaysia, and the Philippines. Although Mr. Archer's wife did not travel with him, she was permitted to retain her passport because she had a separate international trip planned for the same time.
 - On March 6, 2017, Your Honor permitted Mr. Archer to travel on business to Russian and London. Mr. Archer's wife and his oldest child were permitted to join him in London for that leg of his trip.
 - On March 23, 2017, Your Honor permitted Mr. Archer to travel on business to the Philippines. On that occasion Mr. Archer's family did not surrender their passports because, although they did not travel with him, Mr. Archer's wife and children were out of the country on vacation at the same time.
 - On May 9, 2017, Your Honor permitted Mr. Archer to travel on business to London.
 - On June 6, 2017, Your Honor permitted Mr. Archer to travel on business to London.
 - On June 13, 2017, Your Honor permitted Mr. Archer to travel on business to the Philippines and China.
 - On July 26, 2017 Your Honor permitted Mr. Archer to travel on business to Italy, with one of his children.
 - On September 20, 2017, Your Honor permitted Mr. Archer to travel on business to China, Vietnam, the Philippines, and Kazakhstan.
 - On January 23, 2018, Your Honor permitted Mr. Archer to travel on business to China, Hong Kong, and the United Arab Emirates.
 - On February 16, 2018, Your Honor permitted Mr. Archer to travel on business to Mexico.
 - On March 28, 2018, Your Honor permitted Mr. Archer to travel on business to China.
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- On August 7, 2018, following the jury's verdict in this case, Your Honor permitted Mr. Archer to travel on business to Ukraine.
- On September 14, 2018, Your Honor permitted Mr. Archer to travel on business to London.
- On December 26, 2018, Your Honor permitted Mr. Archer, his wife, and their three small children to travel to Jamaica on vacation.
- On January 7, 2019, Your Honor permitted Mr. Archer to travel on business to England and France.
- On February 17, 2019, Your Honor permitted Mr. Archer to travel on business to Singapore, Indonesia, and Hong Kong.

[See ECF Nos. 41, 62, 78, 83, 84, 98, 111, 122, 148, 162, 166, 179, 182, 185, 189, 236, 305, 316, 363, 560, 620, 711, 715, and 730.]

If the Court permits him to travel with his family, Mr. Archer will report daily to his Pretrial Services Officer while he is away, and of course the open-ended waiver of extradition that Mr. Archer previously signed is still effective. Accordingly, I respectfully request permission for Mr. Archer to take the trip described in the attached exhibit.

Thank you for your consideration of this request.

Respectfully,

/s/ Craig Wenner
Craig Wenner

cc: BY ELECTRONIC MAIL

AUSAs Rebecca Mermelstein, Brendan Quigley, and Negar Tekeei
U.S. Pretrial Services Officer Andrew R. Kessler-Cleary
